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51
52 UNITED STATES DISTRICT COURT
 53 **NORTHERN DISTRICT OF CALIFORNIA**

54 ANIBAL RODRIGUEZ, JULIEANNA
 55 MUNIZ, ELIZA CAMBAY, SAL
 56 CATALDO, EMIR GOENAGA, JULIAN
 57 SANTIAGO, HAROLD NYANJOM,
 58 KELLIE NYANJOM, and SUSAN LYNN
 59 HARVEY, individually and on behalf of all
 60 others similarly situated,

61 Plaintiffs,

62 vs.

63 GOOGLE LLC,

64 Defendant.

65 Case No.: 3:20-cv-04688

66 **ADMINISTRATIVE MOTION TO**
67 CONSIDER WHETHER ANOTHER
68 PARTY'S MATERIAL SHOULD BE
69 SEALED

70 The Honorable Alex G. Tse
 71 Courtroom A – 15th Floor
 72 Trial Date: Not Yet Set

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether
 2 Google LLC's ("Google") material should be sealed. The material is contained within the Joint
 3 Letter Brief regarding Plaintiffs' request that the Court order Google to negotiate with Plaintiffs
 4 to establish a preservation plan in this case and perform other preservation-related tasks
 5 ("Preservation Joint Letter Brief").

6 Document Sought to 7 be Sealed	8 Party Claiming 9 Confidentiality	10 Portions to be filed 11 under seal	12 Basis for Sealing 13 Portion of Document
14 Preservation Joint 15 Letter Brief	16 Google	17 Portions highlighted in 18 Blue on page 4	19 Refers to material 20 designated 21 "Confidential" or 22 "Highly Confidential – 23 Attorneys' Eyes Only" 24 pursuant to the 25 Protective Order
26 Declaration of Steve 27 Ganem	28 Google	29 Entirety	30 Refers to material 31 designated 32 "Confidential" or 33 "Highly Confidential – 34 Attorneys' Eyes Only" 35 pursuant to the 36 Protective Order

16 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
 17 responsibility to establish that its designated material is sealable.

18 Dated: November 12, 2021

19 Respectfully submitted,

20 By: /s/ Amanda Bonn

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